

United States Bankruptcy Court
Eastern District of Wisconsin

In re **Chad M Davidson**

Case No. **15-33834**

Debtor

Address **3921 W County Line Rd #8**
Brown Deer, WI 53209

Chapter **13**

Last four digits of Social Security or Individual
Tax-payer Identification (ITIN) No(s), (if any): **xxx-xx-0845**
Employer's Tax Identification (EIN) No(s), (if any): _____

OBJECTION TO MOTION FOR LIFT OF STAY

NOW COMES Chad M. Davidson, Debtor(s) herein, by counsel, Edward W. Harness, and
in support of his objection to the Motion for Lift of Stay does say:

1. On December 31, 2015, the above captioned Debtors commenced this proceeding under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor's original in accordance with the plan filed changed. He intended to surrender the property and relocate for an employer.
3. Debtor's Mother suffered a medical set back and he is needed for her care.
4. Debtor will make a lump sum payment to cure the post-petition mortgage arrearage.
5. Debtor will file an amended Chapter 13 plan to account for the entire property tax claim.
6. Debtor will file an Adversary Proceeding to strip the lien of the 2nd mortgage on the property.

WHEREFORE, the Debtor(s), Chad M. Davidson, objects to the Motion to Lift of Stay, and, Appropriate Orders of Protection.

Date **April 19, 2016**

Signature **/s/ Edward W. Harness**
Name **Edward W. Harness 1030509**
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